

LATHAM & WATKINS LLP
Marvin S. Putnam (Bar No. 212839)
marvin.putnam@lw.com
Laura R. Washington (Bar No. 266775)
laura.washington@lw.com
10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Telephone: +1.424.653.5500
Facsimile: +1.424.653.5501

Attorneys for Defendants
Netflix, Inc., and
Netflix Worldwide Entertainment, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

FIONA HARVEY,

Plaintiff,

v.

NETFLIX, INC., and NETFLIX
WORLDWIDE ENTERTAINMENT,
LLC,

Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**DECLARATION OF CRAIG
SEYMOUR IN SUPPORT OF
DEFENDANTS' SPECIAL MOTION
TO STRIKE**

Date: September 3, 2024

Time: 9:00 a.m.

Place: Courtroom 850

Hon. R. Gary Klausner

DECLARATION OF CRAIG SEYMOUR

I, Craig Seymour, declare as follows:

1. I was the General Manger of the Hawley Arms pub from July 2006 to June 2019. Richard Gadd worked at the Hawley Arms within this time period, and was subjected to stalking and harassment from Fiona Harvey, much of which I witnessed first-hand.

2. I was working at the Hawley Arms with Richard on the day that Ms. Harvey first came into the pub in 2014. While I cannot recall exactly what day it was, I remember that Ms. Harvey looked sad and we offered a free cup of tea. Richard gave it to her and I approved it.

3. I witnessed Ms. Harvey's subsequent harassing conduct and behavior toward Richard, which commenced shortly after that first interaction. Ms. Harvey figured out Richard's shift patterns and would turn up to the pub on the days he worked. She would stand outside the pub and wait for him to turn up, and would then sit at the end of the bar and talk at him constantly throughout his shifts. Richard was working and couldn't escape these interactions with Ms. Harvey. At the start, Ms. Harvey's behavior was more tongue-in-cheek and flirtatious, but quickly became much more serious, violent, and nasty. Ms. Harvey said terrible things to Richard, particularly statements that were sexual in nature and often about her menstrual cycle. Ms. Harvey's interactions with Richard soon became explicit, dark, and inappropriate. The impression I got was that she lived in a fantasy world and as soon as someone was nice to her and talked to her she took it to the next level. We try to do the right thing when people come into the pub and are sad, but Richard did so and she then made his life a misery.

4. Around mid-2014, Richard confided in me about the full nature of Ms. Harvey's behavior towards him by showing me the emails she was sending him. I remember he also forwarded abusive emails she had sent him to my work email account (which I no longer have access to). There was a constant stream of emails

1 that he would regularly show me that were just as nasty and bizarre as her
2 interactions with him in the pub. She clearly fantasized about having a sexual
3 relationship with him and the emails were incredibly explicit. He had initially been
4 putting on a brave face but I realized the impact it was having on him and he said to
5 me that this just couldn't go on any longer. He said it was becoming really scary
6 and intense and was really freaking him out. It was clearly making him feel really
7 uneasy and fearful. What she was doing was well beyond what was acceptable.

8 5. At some point after having seen the emails she was sending him I told
9 her that she wasn't welcome at the pub anymore and wouldn't be allowed in. I told
10 her that she was harassing one of my staff members and I needed to look after him.
11 Whilst I don't think she actually came inside the pub after that point she was very
12 persistent and continued to turn up outside the pub on the dates and times when
13 Richard was due to start working. She figured out that he would start work at 10am,
14 even though the pub wouldn't open until midday. She would be there outside the
15 pub when he arrived for work. We used to try and sneak him through the side
16 entrance so that he wouldn't have to interact with her. I would have to go outside
17 the front and tell her to leave. It was total harassment and no staff member should
18 have to try and dodge someone hanging outside the front of the business that they
19 work in

20 6. I was also aware that Richard had been liaising with the police about
21 Ms. Harvey's stalking and harassing behavior, but the police initially did not take
22 Richard's reports seriously. It was my impression that had the genders been
23 reversed, and an older gentleman in his 40s was behaving this way toward a younger
24 woman, the police would have escalated the reports right away. I remember having
25 regular meetings with the police licensing authority, as part of my role as the General
26 Manager of the pub, and I brought up her behavior and the apparent police inaction
27 during one of those meetings. I told the police that her behavior was very serious.
28 The police attending the meeting were licensing officers, so they did not deal with

1 these type of reports, but I remember that they said they would speak to the police
2 officers who would handle harassment reports. At a subsequent meeting, the
3 licensing officers informed me that the police were already aware of Ms. Harvey due
4 to her previous stalking and harassing conduct.

5 7. While I do not remember the exact timeline, the police eventually began
6 to take Ms. Harvey's behavior more seriously, and I was aware that Richard
7 ultimately obtained some sort of anti-harassment order against her. I now
8 understand this to be called a First Instance Harassment Warning.

9 8. I watched Ms. Harvey's interview with Piers Morgan on *Piers Morgan*
10 *Uncensored* on May 9, 2024. Ms. Harvey's statements that she had only met Richard
11 a few times and had only messaged him a handful of times are complete and utter
12 lies. Richard showed me the evidence of the volume of Ms. Harvey's emails at the
13 time and, as for their physical interactions, Ms. Harvey maintained a regular
14 presence at the Hawley Arms when Richard was working at the pub for at least six
15 to nine months. Ms. Harvey was at the pub incessantly, and only stopped turning up
16 regularly once Richard started working less at the pub as his comedy career gained
17 traction. Ms. Harvey's statements during the interview about her contact with
18 Richard were total lies.

19 9. While I cannot recall exactly when Ms. Harvey's harassing conduct
20 stopped, it was around the time that Richard obtained the First Instance Harassment
21 Warning against her. Until that time, Ms. Harvey stalked and harassed Richard for
22 a sustained period time, and her behavior was severe, unpleasant, and nasty. She
23 made him feel really unsafe and freaked out. He was clearly fearful of her and her
24 conduct was totally unacceptable.

25 10. I am also aware that Ms. Harvey has recently made various unpleasant
26 and defamatory statements about me and my family on social media, including
27 references to where I was living at the time. I have deleted my social media accounts
28 and my wife has had to do the same. I have had to tell family members to delete

1 their social media accounts because we are so fearful of her and what she might
2 subject us to. I saw what she did to Richard and the impact it had on him and we
3 want nothing to do with her in our lives. Despite being so fearful of what she might
4 do as a result of my speaking up in support of Richard and Netflix, I feel bound to
5 do so because any suggestion by Ms. Harvey that she did not stalk or harass Richard
6 is completely and utterly false.

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9 I declare under penalty of perjury under the laws of the United States of
10 America that the foregoing is true and correct.

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12 Executed on July 28, 2024 at Norfolk, United Kingdom

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